# IN THE UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re

IDELPHI CORPORATION, et al.,

Chapter 11 Case No. 05-44481 (RDD) (Jointly Administered)

**Debtors** 

OBJECTION TO MOTION FOR AN ORDER APPROVING (I) Disclosure Statement, (II) Record Date, Voting Deadline, (III) Hearing Date to consider confirmation of plan, (IV) Procedures for filing objections to the Plan, (V) Solicitation procedures for woting on Plan, (VI) Cure Claim Procedures, (VII) Procedures For Resolving Disputes Relating To Post petition Interest, And (VIII) Reclamation Claim Procedures (the "Motion"). Pursuant 11 U.S.C. 102(1) And 105 And Fed. R. Bankr. P. 2002(m), 9006, 9007, 9014

#### INTRODUCTION

On or about September 18, 2007 the Skilled Trades Employees of the DELPHI (Delco Electronic Systems) plant 7929 So. Howell Avenue Oak Creek, WI 53154-2931 were served the above titled notice (dated September 6, 2007). The Skilled Trades Employees are now objecting to the Above Titled motion and Restructuring plan.

#### ARGUMENT

The following are reasons set forth:

The Oak Creek Delco Electronic Systems plant 7929 So. Howell Avenue Oak Creek WI has been an ongoing concern since the 1940's and has added vast knowledge and intellect not only to Wisconsin but to the United States. Everything from military, aircraft components and guidance systems including the Apollo Space Program were produced

as a the result of highly skilled design engineering and manufacturing skills. The manufacturing and engineering skills at this plant are and were world class ( receiving an Shingo Award for excellence in manufacturing in 2006). This plant has always maintained profitability even while competing in the competitive auto business. It is a travesty of justice as well as a National Security Risk to close this plant and send these jobs out of the United States to Mexico and Communist China.

The pay rate of production employees here has seen their pay cut by 50% while the CEO's are asking for more than thirty seven million dollars (\$37,000,000) in bonuses and, to close this operation and ship it to Mexico, and Communist China. This is no less than treason being committed against the American People and the employees of the Oak Cheek Delco Electronic Systems DELPHI.

Most of the Money Delphi has used to Open Foreign and Communist plants has come from the backs of the workers of this plant and other plants in the United States they are closing and planning to close.

This is nothing - less than gross violations of public policy, the constitution, and a moral bankruptcy of ethics and intellect in the United States of America.

#### CONCLUSION

The Skilled Trades Employees of Oak Creek Delco Electronic Systems plant 7929 So. Howell Avenue Oak Creek WI are now objecting to the Debtors above titled motion and asking for this plant to remain open and a further examination of the financial records and methods to maintain this plant as an ongoing concern as part of the Restaucturing plan as amended.

Dated at Oak Creek, Wisconsin this 24th day of September 2007.

By: Skilled Trades Employees 7929 So. Howell Avenue Oak Creek, WI 53154-2931

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Peter Katamparanbil

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William Holy

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Bill A. Hollen.

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Steen J. Azymourski

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#### CERTIFICATE OF SERVICE

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### **CERTIFICATE OF SERVICE**

THE UAW SKILLED TRADES CERTIFY that a copy of the foregoing has been sent by USS. Mail to all of the counsel listed in the debtors motion. this 25th day of September, 2007.

BY: Skilled Trades Employees of DELPHI

UAW 7435 S. Howell Ave. Oak Creek, WI 53154 414 - 764-6850

(Delco Electronic Systems) plant 7929 So. Howell Avenue Oak Creek, WI 53154-2931